

EXHIBIT A

MELINDA HAAG (CASBN 132612)
United States Attorney

BRIAN J. STRETCH (CSBN 163973)
Chief, Criminal Division

MATTHEW A. PARRELLA (NYSBN 2040855)
JEFFREY D. NEDROW (CASBN 161299)
JEFFREY R. FINIGAN (CASBN 168285)
Assistant United States Attorneys

450 Golden Gate Avenue
San Francisco, California 94102
Telephone: (415) 436-7232
Facsimile: (415) 436-7234
Email: jeffrey.finigan@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
BARRY LAMAR BONDS,)
)
Defendant.)

Criminal No. CR 07-0732 SI

UNITED STATES' WITNESS LIST

Trial: March 21, 2011
Time: 8:30 a.m.
Court: Hon. Susan Illston

The United States hereby provides notice to the Court and to the defendant of the witnesses it may call in its case-in-chief at the trial. The government may not call all of the witnesses on this list. The government reserves the right to supplement this list as trial preparations progress. The government will notify the defendant of any changes to its witness list.

1 1. Bell, Kimberly: Ms. Bell, the defendant's former girlfriend, will testify that
2 the defendant told her that he was taking steroids prior to the 2000 Major League Baseball
3 season. Ms. Bell will further testify to personal observations regarding changes in the
4 defendant's body during the period of time beginning in the year 2000, including bloating, acne
5 on the shoulders and back, hair loss, and testicle shrinkage. Ms. Bell will further testify to
6 occasions in which she saw the defendant and Greg Anderson together.

7 2. Benard, Marvin: Mr. Benard, a former professional baseball player, will testify that
8 he met Greg Anderson during Benard's tenure with the San Francisco Giants. He will also
9 testify that he began working with Anderson in approximately 1999 and that Anderson assisted
10 him in having his blood tested. Mr. Benard will testify about receiving performance enhancing
11 substances from Anderson, about instructions from Anderson about how to administer the
12 substances, about the schedule Anderson gave to him for administering the substances, and about
13 what Mr. Anderson told him about the efficacy of those substances.

14 3. Bergland, Wendy: She will testify that she is a Special Agent with IRS-CID and that
15 she transported the box of folders located by Mike Wilson to Special Agent Jeff Novitzky.

16 4. Larry D. Bowers, Ph.D., DABC: Dr. Bowers will testify that he is employed as
17 the Senior Managing Director, Technical and Information Resources, for the United
18 States Anti Doping Agency (USADA). Based on his training and experience, Dr. Bowers
19 will also testify that certain items identified in the urine tests of the defendant were
20 anabolic steroids and that it is illegal to distribute and obtain those without a legitimate
21 medical condition requiring a prescription from a physician. Dr. Bowers will also testify
22 to the side effects of steroid use, including effects on blood values, possible organ
23 damage, and other side effects.

24 5. Catlin, Dr. Don: Dr. Catlin will testify that the UCLA Olympic Lab performed the
25 testing on the urine specimen collected from the defendant by Major League Baseball (MLB).
26 He will testify to the results of those tests and their meaning, including the use and results of the
27 Carbon Isotope Ratio test. Dr. Catlin will testify that the results of the test were that he found
28 exogenous testosterone, THG, and clomid in the 2003 sample. He will also testify that THG was

1 never commercially available from any source (other than Patrick Arnold) during the time of the
2 defendant's THG-positive urine specimens. As such, Dr. Catlin's testimony also includes
3 statements as a percipient witness.

4 6. Conte, Stan: Mr. Conte will testify that he is a licensed physical therapist and
5 certified athletic trainer. He began working for the San Francisco Giants in 1992 and became
6 their head athletic trainer in 2000. He will testify regarding his professional background and
7 qualifications and his job duties with the Giants. Mr. Conte will also testify about certain
8 interactions he had with the defendant, about statements by the defendant about Greg Anderson
9 and the search warrant conducted on Anderson's residence in September of 2003, and about
10 observations related to the defendant's physical appearance while working for the Giants. Mr.
11 Conte will testify about his knowledge of the defendant's relationships with third parties, such as
12 Steve Hoskins and Greg Anderson.

13 7. Estalella, Bobby: Mr. Estalella will testify that he was a professional baseball
14 player and that he met the defendant as a result of being employed by the San Francisco Giants.
15 Mr. Estalella will further testify that the defendant admitted using performance-enhancing drugs,
16 and that they had several discussions regarding that topic.

17 8. Geter, Ana: Ms. Geter, a now-retired former Special Agent with Internal Revenue
18 Service, Criminal Investigation will testify regarding her transport of the defendant's urine
19 specimen from its seizure at Quest Laboratories pursuant to search warrant to the UCLA
20 Analytical Lab.

21 9. Giambi, Jason: Mr. Giambi will testify that he is a professional baseball player and
22 that he met Greg Anderson through the defendant. He will also testify that he began working
23 with Anderson in approximately November 2002 and that Anderson assisted him in having his
24 blood and urine tested through Balco. Mr. Giambi will testify about receiving performance
25 enhancing substances from Anderson, about instructions from Anderson about how to administer
26 the substances, about the schedule Anderson gave to him for administering the substances, and
27 about what Mr. Anderson told him about the efficacy of those substances.

28 10. Giambi, Jeremy: Mr. Giambi will testify that he was a professional baseball player

1 and that his brother, Jason Giambi, introduced him to Greg Anderson shortly after Jason began
2 working with Anderson in approximately November 2002. He will also testify that he provided
3 blood and urine specimens to Anderson to be tested through Balco. Mr. Giambi will also testify
4 about receiving performance enhancing substances from Anderson, about instructions from
5 Anderson about how to administer the substances, about the schedule Anderson gave to him for
6 administering the substances, and about what Mr. Anderson told him about the efficacy of those
7 substances.

8 11. Hoskins, Kathy: Ms. Hoskins will testify that she was hired by the
9 defendant as a personal shopper and assistant. She will further testify that she observed
10 interactions between the defendant and Greg Anderson, including Anderson giving the defendant
11 an injection.

12 12. Hoskins, Steve: Mr. Hoskins will testify that he was childhood friends with the
13 defendant and that in approximately late 1992 or early 1993, he began working for the defendant
14 as his assistant. Mr. Hoskins will testify regarding the nature and extent of his working
15 relationship with the defendant, which included handling many of the defendant's personal
16 errands and scheduling, as well as managing the defendant's promotional activities related to his
17 baseball career. During their relationship, Mr. Hoskins became aware that the defendant was
18 using steroids with the assistance of his personal trainer, Greg Anderson. In this regard, he will
19 testify how he learned of the defendant's steroid use through, among other things, both the
20 defendant's and Anderson's admissions to Hoskins. Mr. Hoskins will also testify about other
21 aspects of his relationship with the defendant.

22 13. Izzo, Larry: Mr. Izzo will testify that he was a professional football player and that
23 he first contacted Greg Anderson by phone in approximately January 2003. Mr. Izzo will also
24 testify that he first met Anderson in person in approximately May 2003 at Balco and submitted a
25 urine specimen at Balco at Anderson's request. Mr. Izzo will also testify that submitted
26 additional urine specimens to Anderson at later times as well. Mr. Izzo will also testify about
27 receiving performance enhancing substances from Anderson, about instructions from Anderson
28 about how to administer the substances, about the schedule Anderson gave to him for

1 administering the substances, and about what Mr. Anderson told him about the efficacy of those
2 substances.

3 14. Joseph, Dr. Jean: Dr. Joseph will testify regarding CDT's records related to the
4 urine specimen the defendant produced to CDT in 2003 pursuant to MLB's testing protocol.

5 15. Kennedy, Dale: Mr. Kennedy will testify to the process of collecting the urine
6 specimen from the defendant in 2003 for testing pursuant to Major League Baseball's drug
7 testing program, as well as statements made by the defendant.

8 16. Novitzky, Jeff: Agent Novitzky, currently a Special Agent with the Food and
9 Drug Administration's Office of Criminal Investigations (FDA-OCI), and formerly a Special
10 Agent with the Internal Revenue Service – Criminal Investigation Division (IRS-CID), will
11 testify regarding the IRS-CID investigation for which the defendant was subpoenaed to the grand
12 jury in 2003, i.e. the criminal investigation into the conduct of Balco Laboratories, Victor Conte,
13 and Greg Anderson, among others. Agent Novitzky will testify to observations he made during
14 the execution of search warrants at Balco and Anderson's residence in September 2003 and the
15 role that those observations played in the investigative decision to subpoena the defendant to the
16 grand jury. He will also testify about the manner in which the defendant's false statements in the
17 grand jury influenced the criminal investigation of Conte and Anderson.

18 17. Qaqish, Amjad: Special Agent Qaqish, an agent with Internal Revenue Service-
19 Criminal Investigation, will testify regarding his identification, seizure, and disposition of
20 documents taken from Anderson's residence during the September 3, 2003 search, including
21 calendars and handwritten notes.

22 18. Rios, Armando: Mr. Rios will testify that he was a professional baseball player and
23 that he met Greg Anderson during Rios's tenure with the San Francisco Giants. He will also
24 testify that he began working with Anderson in 2001 and that Anderson assisted him in having
25 his urine tested after Rios left the Giants for another team in 2002. Mr. Rios will testify about
26 receiving performance enhancing substances from Anderson, about instructions from Anderson
27 about how to administer the substances, about the schedule Anderson gave to him for
28 administering the substances, and about what Mr. Anderson told him about the efficacy of those

1 substances.

2 19. Sample, Dr. Barry: Dr. Sample will testify regarding the records of Quest
3 Diagnostics as well as to the methodology utilized to test urine specimens and to certain lab test
4 results.

5 20. Santiago, Benito: Mr. Santiago will testify that he was formerly a professional
6 baseball player for several teams, including the San Francisco Giants in 2001, 2002, and 2003.
7 While playing for the Giants, Mr. Santiago met Greg Anderson and ultimately received
8 performance enhancing substances from Anderson. Mr. Santiago will also testify about the
9 process of providing urine samples to Greg Anderson for testing for the presence of steroids. Mr.
10 Santiago will also testify about schedules or calendars Greg Anderson made for him in
11 connection with the performance enhancing substances regimen Anderson designed for Mr.
12 Santiago.

13 21. Ting, Dr. Arthur: Dr. Ting will testify that he was the defendant's
14 orthopedic surgeon and will testify as to his physical observations of the defendant as well as his
15 observations of the defendant's interactions with Greg Anderson. Dr. Ting will also testify that
16 he drew blood from the defendant for testing, and that he gave the specimens to Greg Anderson
17 to deliver.

18 22. Valente, Jim: Mr. Valente, the former vice-president of Balco Laboratories, will
19 testify to his observations as an employee at Balco responsible for maintaining certain business
20 records, including log sheets reflecting the receipt of urine specimens from athletes, the
21 assignment of codes to those specimens, the referral of those specimens to outside labs, and the
22 receipt of test results for those specimens. Valente will testify that Greg Anderson provided him
23 with blood and urine specimens for a number of athletes, including the defendant, and Valente
24 would record the names of those athletes on a log sheet and assign each specimen a number in
25 order to keep track of the specimen's testing referral date and results. Valente will specifically
26 testify that the entries "Barry B" on Balco internal documents reference the urine samples and
27 results he entered for the urine samples Greg Anderson submitted to Balco on behalf of the
28 defendant.

23. Velarde, Randy: Mr. Velarde will testify that he was a professional baseball player and that he met Greg Anderson during his tenure with the Oakland Athletics. Mr. Rios will testify about receiving performance enhancing substances from Anderson, including anabolic steroids.

24. Wilson, Mike: He will testify that he is a Special Agent with IRS-CID and that he located a box of folders during the execution of a search warrant at a storage locker belonging to Balco Laboratories. He will also testify regarding the transport and handling of the defendant's urine specimen from its seizure pursuant to search warrant at Quest Laboratories to the UCLA Analytical Lab.

25. Anderson, Greg: Mr. Anderson has been served with a subpoena that requires him to testify at trial. Based upon his prior statements to the court, it is anticipated that Mr. Anderson will refuse to comply with the subpoena.

26-37. Witnesses from UCLA Olympic Lab: The government may call some or all of the following witnesses regarding the chain of custody maintained by the UCLA Lab in handling and processing the steroids test for the defendant's urine specimen – Brian Bishop, Borislav Starcevic, Dr. Catlin, Yvonne Chambers, Todd McGauley, Stephen Kauffman, Brian Aherns, Javier Ceballos, Holly Daley, Ronald Gonzalez, Anabela Leung, Feresthteh Delshad, and Yu-Chen Chang.

DATED: October 15, 2010

Respectfully submitted,

MELINDA HAAG
United States Attorney

/s/

MATTHEW A. PARRELLA
JEFFREY D. NEDROW
JEFFREY R. FINIGAN
Assistant United States Attorneys

MELINDA HAAG (CASBN 132612)
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Assistant United States Attorneys

450 Golden Gate Avenue
San Francisco, California 94102
Telephone: (415) 436-7232
Facsimile: (415) 436-7234
Email: jeffrey.finigan@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BARRY LAMAR BONDS,

Defendant.

Case No. CR 07-0732 SI

UNITED STATES' EXHIBIT LIST

Trial: March 21, 2011
Time: 8:30 a.m.
Court: Hon. Susan Illston

1 The United States may offer the exhibits set forth on the attached list at the trial of this
2 case. The United States reserves the right to revise and supplement the list before and/or during
3 trial.

4
5 Dated: October 15, 2010

Respectfully submitted,

6 MELINDA HAAG
7 United States Attorney

8 /s/
9 _____
10 MATTHEW A. PARRELLA
11 JEFFREY D. NEDROW
12 JEFFREY R. FINIGAN
13 Assistant United States Attorneys
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No.: CR 07-0732 SI Date: March 21, 2011

United States of America vs. Barry L. Bonds

GOVERNMENT'S EXHIBIT LIST

(X) Plaintiff

() Defendant

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
1			Balco Log Sheets (26 p.)
2			2 Balco Letters (5/30/03; 6/6/03) (4 p.)
3			BLB Quest Documents (10 reports; 38 p.)
4			Balco Letter (7/3/03) (2 p.)
5			Other Athlete Quest Documents (14 reports, 30 p.)
6			Specialty Lab & Fedex Documents (2 p.) (1/19/01)
7			B, B Specialty Lab Results (20 p.)

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
8			Balco Balco Blood Test Log Books 2001-2003 (8 pgs.)
9			Balco BLB Blood Tests (1/19/01; 4/12/01; 2/5/03) (13 p.)
10			LabOne Blood Test Fedex Documents (4 p.) (1/8/02; 4/12/02)
11			BLB Nutritional Program (2 p.)
12			Other Athlete Balco & Specialty Blood Tests (38 p.)
13			LabOne Tests (1) & BLB Calendars (11) (12 p.)
14			Brown Portfolio
15			B. Santiago Invoice
16			A. Rios Fedex Receipts (3 p.)
17			R. Estalella Documents (11 p.)
18			L. Izzo Documents (10 p.)

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
19			Jason Giambi Documents (23 p.)
20			Jeremy Giambi Documents (19 p.)
21			Misc. Notes re Other Athletes (7 p.)
22			HGH Kit
23			Syringes
24			Clear & Cream Vials (8 total)
25			Clear & Cream (shown to BLB in GJ)
26			HGH Kits Syringes
27			BLB CDT Document (6/4/03)
28			Envelopes located with cash (13 p.)
29			Handwritten Note
30			HGH Vials (9 vials)
31			Handwritten notes & Fedex Rec't-Other Athletes (3 p.)

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
32			BLB Handwritten Note
33			Calendars, BLB Tests, Quest, and LabOne in folder labeled "B" (37 p. & Folder)
34			A. Rios File (22 p. & Folder)
35			Home Run List & Floppy Disc (4 p.)
36			BLB Article (3 p.)
37			R. Velarde File (11 p. & Folder)
38			"Greg Anderson 25" File - Lab One & Quest Documents w/ BLB DOB (4 p. & Folder)
39			B. Estalella File (15 p. & Folder)
40			B. Santiago File (26 p. & Folder)
41			Jason Giambi Document & Fedex Rect. (4 p.)
42			Valente Plea Agreement
43			Dr. Ting Steroid Research Document (6 p.)

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
44			Recording of conversation (Hoskins-Anderson) Transcript (7 p.)
45			Quest Documents 100121 (58 p.)
46			Quest Documents 100145 (2 p.)
47			Quest Documents 100155 (104 p.)
48			Quest Documents 100321 (58 p.)
49			Quest Documents 100404 (59 p.)
50			Quest Documents 100424 (43 p.)
51			Quest Documents 100545 (39 p.)
52			Quest Documents 100552 (41 p.)
53			Quest Documents 100572 (41 p.)

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
54			Quest Documents 100573 (38 p.)
55			Quest Documents & Vials 51015032 - 0085157 (2 vials, 2 p.)
56			Quest/IRS/UCLA Documents 51015032 - 0085157 (2 p.)
57			UCLA Documents 51015032 - 0085157 (22 p.)
58			UCLA Documents 51015032 - 0085157 (28 p.)
59			LabOne Blood Tests Barry Bonds (44 p.)
60			Specialty Lab Tests
61			Photo-Balco Exterior
62			Photo Log Sheets-Balco
63			Photo - HGH Kit-Anderson Residence
64			Photo Athlete Folders From Closet-Anderson Residence

Exhibit Number	Date		Description
	Marked for Identification	Admitted in Evidence	
65			Photos - drawer w/ Barry note & drugs-Anderson Residence
66			Photo - Safe open-Anderson Residence
67			Photo - Safe w/ \$ & note-Anderson Residence
68			Photo - Quest form re BLB MLB-Anderson Residence Urine Collection 6/4/03
69			Photo - box w/ syringes & pills-Anderson Vehicle
70			Photo - Brown Portfolio-Anderson Vehicle
71			Magazine Article - Anderson, Conte, and BLB- Located in BALCO trash
72			Magazine Article - BONDS and Balco - Located in BALCO trash
73			Magazine Article - Anderson-Conte and BLB - Located at Conte Residence
74			Bonds GJ Transcript w/ exhibits
75			Bonds Immunity Order
76			Player Testing Protocol Acknowledgment, (4 p.)

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